

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) Case No.: 4:23-cr-00578-AGF-NCC
)
 CONNIE BOBO,)
)
 Defendant.)

SECOND MOTION TO CONTINUE TRIAL

COMES NOW Defendant, Connie Bobo, by and through counsel, and hereby moves this Court to continue the trial date currently set for September 3, 2024. In support of this motion, Defendant states as follows:

1. Defendant is currently set for trial on September 3, 2024.
2. While the parties have been in communication to come to an agreed upon disposition, it appears this matter will likely proceed to trial.
3. Counsel believes the trial will last approximately 7-10 days.
4. Due to competing trial settings, counsel for Defendant's first availability for a trial of this length appears to be beginning the week of January 20, 2025.
5. Additional time is thus necessary to provide "defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence."
18 U.S.C. § 3161(h)(7)(B)(iv).
6. Counsel has filed an executed Waiver of Speedy Trial.
7. Defendant, through counsel, has discussed this matter with Assistant United States Attorney, Derek Wiseman. Mr. Wiseman is unopposed to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court continue the trial currently set for September 3, 2024.

Respectfully submitted,

By: /s/ Marc Johnson
ROSENBLUM SCHWARTZ FRY & JOHNSON P.C.
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Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2024, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Derek Wiseman, Assistant United States Attorney.